

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

**DALLAS BUYERS CLUB, LLC,**

Plaintiff,

v.

**JOHN HUSZAR,**

Defendant.

Case No: 3:15-cv-00907-AC

STIPULATED  
PROTECTIVE ORDER  
(Computer Source Code)

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STIPULATED PROTECTIVE ORDER  
(Computer Source Code)

Relevant to this case are documents and information from third-parties Excipio GmbH, and Maverickeye, UG including proprietary and confidential software source code and machine code for the software used to identify the IP address used by the defendant to infringe plaintiff's rights in its motion picture. Excipio and Maverickeye maintain the requested documents and information as confidential, even as to each other, and subject to protection under Federal Rule of Civil Procedure 26(c).

As an addendum to the current Protective Order (Ecf. 106) in this action, all matters that may apply to the computer source code / software of Excipio or Maverickeye are to be subject to the further restrictions of including, but not limited to:

1. Plaintiff's expert is designated as Robert D. Young of Ability Systems, Corp. / Johnson-Laird, Inc.: PO Box 6593 Aloha OR 97007 Tel: (503) 259-2614 FAX: (503) 802-9711 Robert@AbilitySys.com.

2. Defendant's expert is designated as Kal Toth, 304-1132 SW 19<sup>th</sup> Ave, Portland, Oregon, Tel: (503) 984-3531, kalmanctoht@gmail.com.

3. Prior to obtaining access, each expert shall expressly agree to be bound by the terms of the protective orders in this action and other orders of the court with the return of the acknowledgement attached as Exhibit A.

4. Only the disclosed specific experts and the listed counsel for the parties, Carl D. Crowell, J. Curtis Edmondson, and Michael O. Stevens personally, and no other party, including affiliated counsel and staff shall have access to the Excipio and Maverickeye software / source code. This limitation of parties with access to be strictly construed.

IT IS SO ORDERED.

DATED:

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United States Magistrate Judge

So Stipulated:

/s/ Carl D. Crowell  
Carl D. Crowell, OSB #982049

/s/ Joseph Curtis Edmondson  
Joseph Curtis Edmondson, PHV

EXHIBIT A

I, \_\_\_\_\_, have been advised by counsel of record for \_\_\_\_\_ in  
Dallas Buyers Club, LLC v. Huszar, Case 15-cv-00907-AC in the United States District Court  
for the District of Oregon, of the Protective Orders (including those at to Computer Source Code)  
governing third party documents including computer software, source code and machine code, to  
be produced for my review in this litigation. I have read a copy of the relevant orders and agree  
to abide by the terms of the orders

Signed: \_\_\_\_\_

Printed: \_\_\_\_\_

Address: \_\_\_\_\_

Tel: \_\_\_\_\_

Email: \_\_\_\_\_

Retained expert for: \_\_\_\_\_